

To: Indiana Disability Rights

From: John Barth, President/CEO, INARF  
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RE: Indiana Disability Rights Proposed Goals & Priorities for 2021

Date: July 20, 2020

Thank you for the opportunity to comment on the Indiana Disability Rights Proposed Goals & Priorities for 2021. INARF applauds the organization for the importance it places upon obtaining public input from a wide range of stakeholders in developing the goals and priorities, and is confident that the feedback received will be carefully considered in the final development of the plan. Please know that beyond our written comments, INARF is dedicated to assisting Indiana Disability Rights in any way appropriate to improve systems and services to individuals with disabilities.

INARF is the principal statewide trade association representing agencies that serve Hoosiers with intellectual and developmental disabilities. INARF Members often play a lifelong role in the lives of those they serve by providing a continuum of services that in many instances stretches from birth to death and across all facets of life in their chosen community. Further, INARF and its members are committed to ensuring Indiana's system of services and supports for individuals with intellectual and developmental disabilities offers maximum options, access, and choice. To that end, we appreciate the opportunity to provide our feedback on the draft goals and priorities. We appreciate in advance your thorough review and consideration of their feedback.

The three goals outlined by Indiana Disability Rights are essential to ensuring people live full, high-quality lives in communities. Additionally, INARF would like to thank you for your efforts over the past year to address individual legal advocacy, accessibility, voting rights, and promotion of self-advocacy and supported decision making. We are pleased to see that these initiatives continue to be priorities for IDR.

In addition to this general observation, INARF offers comments on a few key areas that should be addressed to provide additional information and inclusion. Specifically, INARF recommends the following:

**Goal 1: Preventing, Finding, and Stopping Abuse, Neglect, and Exploitation of Persons with Disabilities in Facilities.**

- Goal 1 Priority 2: INARF believes the most important role of providers is to ensure the health, safety, and quality of life for persons with disabilities. IDR's proposed priority regarding the investigation of suspected abuse and neglect in facilities that provide services to people with disabilities is consistent with that belief. INARF also acknowledges and appreciates IDR's participation in the Division of Disability and Rehabilitative Services (DDRS) Advisory Council and Living Well/Nexus Charting the LifeCourse Stakeholder Group

and encourages IDR to work collaboratively with Liberty of Indiana, the Bureau of Quality Improvement Services quality contractor, as it provides compliance oversight for services administered by DDRS. Additionally, we urge IDR to share any promising practices identified through your monitoring activities with INARF to inform our membership and with Liberty for their distribution through training and technical assistance to providers.

- Goal 1 Priority 3: INARF believes that monitoring is integral to ensuring the health, safety and welfare of individuals with disabilities and applauds IDR's monitoring efforts. We would encourage IDR to collaborate with other state monitoring authorities to the greatest extent possible.

**Goal 2: Breaking Down Barriers and Ensuring Supports are Available for Persons with Disabilities to Ensure Equity and Inclusion in Society.**

- Goal 2 Priority 2: INARF applauds IDR's focus on providing individual and systemic advocacy relating to COVID-19 policies and practices. Many individuals with disabilities' lives have been dramatically altered due to the pandemic, and advocacy will ensure that they are included and treated equally going forward.
- Goal 2 Priority 3: INARF appreciates your leadership in advancing supported decision making including advocating for the passage of Senate Bill 380 during the 2019 Legislative Session and leading the Administration for Community Living Supported Decision Making Stakeholder Group in 2020. INARF has participated on this workgroup and applauds the work that it has done to develop a plan to systematically address unnecessary guardianships. We appreciate our ongoing collaboration with IDR on the development of this plan and look forward to the continued expansion of supported decision making in Indiana.
- Goal 2 Priority 4: INARF appreciates IDR's efforts to uphold the rights of individuals with disabilities by conducting impact litigation. We remain deeply concerned about the children with disabilities who are under the welfare of the Department of Child Services and applaud IDR's efforts to protect their health and safety.

**Goal 3: Empowering Persons with Disabilities by Serving as a Partner in Rights Issues, Providing Resources for Self-Advocacy and by Bringing Awareness Through Outreach to Society to Eliminate Discrimination.**

- Goal 3 Priority 3: INARF applauds IDR's ongoing collaboration with self-advocacy organizations to increase the awareness and effectiveness of voting initiatives, supported decision making, and other activities that advocate for the rights of individuals with disabilities.
- Goal 3 Priority 4: INARF appreciates IDR's efforts to educate legislators regarding the impact of policies on individuals with disabilities and your focus on creating a plan for participating in State policy processes. As an advocacy organization with an internal registered lobbyist and a contract lobbyist, we encourage IDR and the IPAS Commission to actively engage in legislative and administrative advocacy. With the discussions regarding the fiscal impact of COVID-19 and new policies created in response to the pandemic, upcoming Electronic Visit Verification implementation, DDRS HCBS waiver redesign and rate methodology initiatives, the HCBS Settings Rule, and implementation of the 1102 Task Force recommendations, we believe it is a critical time for disability leaders to collaboratively advocate and educate legislators and policymakers, and IDR's participation is essential.